

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**John K. Goodrow,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO.: 3:11-cv-00020-MHL  
(Consolidated)**

**Friedman & MacFadyen, P.A., et. al.**

**Defendants.**

**PLAINTIFFS' SECOND MOTION FOR ENLARGEMENT OF TIME TO  
COMPLY WITH THIS COURT'S ORDER DATED SEPTEMBER 10, 2012**

COMES NOW the Plaintiffs, by counsel, and pursuant to Fed. R. Civ. P. 6(b), and moves the Court for an Enlargement of Time within which to respond to this Court's Order (Docket No. 50) dated September 10, 2012, requiring Plaintiffs to file any amended complaints, motions to amend complaints, and motion to consolidate from September 12, 2012, to September 14, 2012.

Plaintiffs previously requested an extension of time by one day to comply with the court's order. Despite several attorneys dedicated to the tasks of drafting amended complaints and motions, conferring with the many individuals who are the clients, the Plaintiffs nonetheless require additional time to complete all the tasks required under the Order. Previously, counsel for Defendants consented to a one-day enlargement, prior to the expiration of the original time to file. Though the court has not entered an order granting the extension, the Plaintiffs now move in good-faith for a second time to grant an extension until September 14, 2012, to file the amended complaints, motion for leave to amend, and other motions. These cases are fact-intensive, complex cases, and Plaintiffs desire to do a complete job. Thus, Plaintiffs respectfully request an extension until midnight tomorrow to comply with this Court's Order.

The Defendant will suffer no legal prejudice as a result of an extension and justice will be

served by granting this motion. Plaintiff has attempted to seek consent of the Defendant but was unable to reach counsel at the time this motion was filed. For these reasons, the Plaintiffs respectfully request a second enlargement of time.

Respectfully Submitted,

/s/

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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of September, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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